

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

MARIELA PEREZ, on behalf of herself §
and others similarly situated §

Plaintiff, §

v. §

MCCREARY, VESELKA, BRAGG & §
ALLEN, P.C., MVBA, LLC f/k/a/ §
MCCREARY, VESELKA, BRAGG & §
ALLEN, LLC, and JOHN DOES, §
Defendants. §

CASE NO. 1:19-cv-00724

DEFENDANTS' OFFER OF JUDGMENT

TO PLAINTIFF MARIELA PEREZ, BY AND THROUGH HER COUNSEL:

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Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants Mccreary, Veselka, Bragg & Allen, P.C and Mccreary, Veselka, Bragg & Allen, LLC (“Defendants”) hereby offers to allow judgment to be taken against them in favor of Plaintiff’s individual claims as follows:

1. Judgment shall be entered against Defendants, jointly and severally, on Plaintiff’s individual claims in the amount of Twenty Thousand Dollars (\$20,000.00).
2. The \$20,000.00 will be entered into the registry of the Court, and upon acceptance of this offer of judgment, Defendants shall motion the Court for the funds to be released to Plaintiff.
3. The judgment entered in accordance with this Offer of Judgment is to be in total settlement of any and all of Plaintiff’s individual claims and potential claims against both Defendants and any of their employees, directors, representatives, agents, servicers, clients and subcontractors.

4. This Offer of Judgment is made solely for the purposes specified in Rule 68 and is not to be construed either as an admission that Defendants are liable in this action, or that Plaintiff has suffered any damages.

Respectfully submitted,

MALONE FROST MARTIN PLLC

/s/ Robbie Malone

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